REMARKS

In the Office Action, the Examiner noted that Claims 1-20 and 25-28 are pending in the application and that Claims 1-20 and 25-28 are rejected. By this response, Claims 1, 5, 7-8, 10, 12, 14, 17, 25, and 27-28 are amended. In view of the above amendments and the following discussion, Applicants submit that none of the claims now pending in the application are anticipated under the provisions of 35 U.S.C. §102. Thus, Applicants believe that all of these claims are now in condition for allowance.

Rejection Of Claims Under 35 U.S.C. §102

The Examiner rejected Claims 1-20 and 25-28 as being anticipated by Richardson (United States Patent 6,606,735, issued August 12, 2003). The rejection is respectfully traversed.

More specifically, the Examiner stated that Richardson discloses obtaining a rule document, generating a table file from the rule document, obtaining a parameterized rule file, and mapping values associated with rules in the table file to matching rules in the parameterized file. (Final Office Action, p. 2). The Examiner further stated that Richardson teaches a data structure comprising a plurality of logical operations associated with respective rules names each of which comprises a rule indicator. (Final Office Action, p. 5). The Examiner concluded that Richardson anticipates Applicants' invention recited in Claims 1, 10, and 21. Applicants respectfully disagree.

Richardson discloses expressing DRC rules in a high-level programming language, referred to as meta language. The meta language is independent of a language of a specific verification tool (native language). (Richardson, col. 4, lines 10-25). DRC rules in the meta language may be categorized into several types respectively associated with templates (DRC templates). The DRC templates map each DRC rule in the meta language onto one or more rules in the native language. (Richardson, col. 4, lines 26-40). A user specifies a DRC rule in the meta language by noting the name of the template, the layer(s) of the integrated circuit design on which the DRC check is to be applied, and values to be used in applying the DRC rule. A

runset generator searches a template library for the named template and, if the template is found, generates an instruction in the native language. (Richardson, col. 5, lines 37-50).

Richardson, however, does not teach each and every element of Applicants' invention recited in amended claim 1. Namely, Richardson does not teach or suggest: (1) obtaining a parameterized rule file having logical operations associated with design rule names; and (2) replacing the design rule names in the parameterized rule file with design rule values in a table file corresponding to the design rule names. First, in Richardson, the user must specify DRC rule values in the meta language representation. (Richardson, col. 5, lines 37-50). In Applicants' claim 1, the parameterized rule file includes logical operations associated with design rule names, not design rule values. Thus, the meta language representation of Richardson is not equivalent to the parameterized rule file of claim 1.

Second, Richardson discloses mapping a rule expressed in one language (the meta language) to a rule expressed in another language (a native language of a tool). A design rule is not the same as a design rule value. In Richardson, the design rule values are specified by the user for design rules in the meta language. When the meta language representation is processed, the design rules are not mapped to design rule values, but are rather mapped to design rules of a different language. The corresponding design rule values are merely replicated from the meta language representation to the other language. In Applicants' claim 1, the parameterized rule file includes design rule names, which are then replaced with design rule values obtained from a table file for the design rule names. Mapping a rule to a rule, as disclosed by Richardson, does not teach or suggest replacing design rule names in a parameterized rule file with design rule values in a table file corresponding to the design rule names, as claimed by Applicants.

"Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim." Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 221 USPQ 481, 485 (Fed. Cir. 1984). Since Richardson does not teach or suggest (1) obtaining a parameterized rule file having logical operations associated with design rule names;

and (2) replacing the design rule names in the parameterized rule file with design rule values in a table file corresponding to the design rule names, Richardson does not teach each and every element of Applicants' claim 1. Accordingly, claim 1 is not anticipated by Richardson.

Claim 10 recites, among other features, a signal bearing medium having a program which, when executed by a processor, causes execution of the steps of (1) obtaining a parameterized rule file having logical operations associated with design rule names; and (2) replacing the design rule names in the parameterized rule file with design rule values in a table file corresponding to the design rule names. Claim 25 recites, among other features, (1) a means for obtaining a parameterized rule file having logical operations associated with design rule names; and (2) a means for replacing the design rule names in the parameterized rule file with design rule values in a table file corresponding to the design rule names. As discussed above, Richardson fails to teach or suggest these features. Accordingly, claims 10 and 25 are not anticipated by Richardson. Claims 2-9, 11-20, and 26-28 depend, either directly or indirectly, from Claims 1, 10, and 15 and recite additional features therefor. Since Richardson does not anticipate Applicants' invention as recited in claims 1, 10, and 25, dependent Claims 2-9, 11-20, and 26-28 are also not anticipated and are allowable.

In view of the foregoing, Applicants contend that claims 1-20 and 25-28 are not anticipated by Richardson and, as such, fully satisfy the requirements of 35 U.S.C. §102. As such, Applicants respectfully request that the rejection of such claims be withdrawn.

CONCLUSION

Thus, the Applicants submit that none of the claims presently in the application are anticipated under the provisions of 35 U.S.C. § 102. Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring any adverse final action in any of the claims now pending in the application, it is requested that the Examiner telephone Mr. Kim Kanzaki, Esq. at (408) 879-6149 so

that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

All claims should be now be in condition for allowance and a Notice of Allowance is respectfully requested.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450, on December 29, 2005.

Pat Tompkins _____ Pat Tompkins
Name *Signature*